



January 11, 2017

**Via Electronic Filing**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

**Re: Notice of Ex Parte Communication: WC Docket No. 95-155;  
WT Docket No. 08-7**

Dear Ms. Dortch:

On January 9, 2017, Craig Lennon, Strategic Negotiator and Manager of Messaging and Voice for Google, Austin Schlick, Director of Communications Law for Google, and I met with Kris Monteith, Heather Hendrickson, Marilyn Jones, Michelle Sclater (via phone), Ann Stevens, and Sanford Williams (via phone) of the Wireline Competition Bureau; Michael Janson, Pramesh Jobanputra, Karen Sprung, and Matt Warner of the Wireless Telecommunications Bureau; Kristi Thompson of the Enforcement Bureau (via phone); and Terry Cavanaugh of the Office of General Counsel to discuss Somos, Inc.'s petition for declaratory ruling regarding registration of text-enabled toll free numbers. We explained that bypassing the Resp Org in the process of text-enabling an 800-number creates risks to businesses and users. These risks in turn deter the adoption of valuable advertising services analogous to those offered by Google and others for toll free voice calling. To date, industry efforts have not adequately addressed these issues.

We provided the attached materials describing Google's interest in the administration of toll free numbers and our support for a notice-and-comment proceeding to address the issues presented in the Somos petition.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced dockets for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,

A handwritten signature in purple ink that reads "Darah Smith Franklin".

Darah Smith Franklin  
Counsel  
Google Inc.

cc: Via electronic mail  
Meeting participants

# Google & Text-Enabled Toll Free Numbers

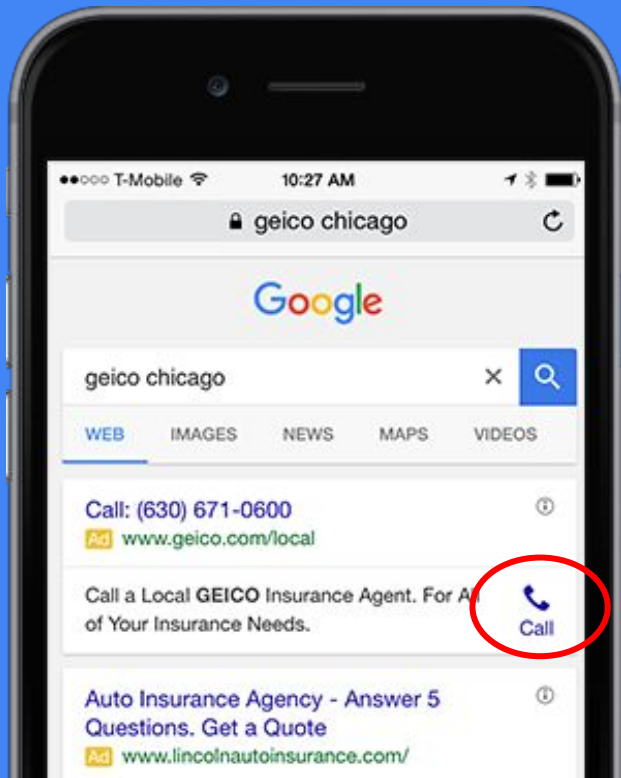
FCC Presentation  
WC 95-155, WT 08-7  
January 9, 2017

# Overview

- 1 Google's use of 800 numbers
- 2 Problems with the current framework
- 3 Recommendations

# Google's use of 800 numbers

# Click-to-call Ads

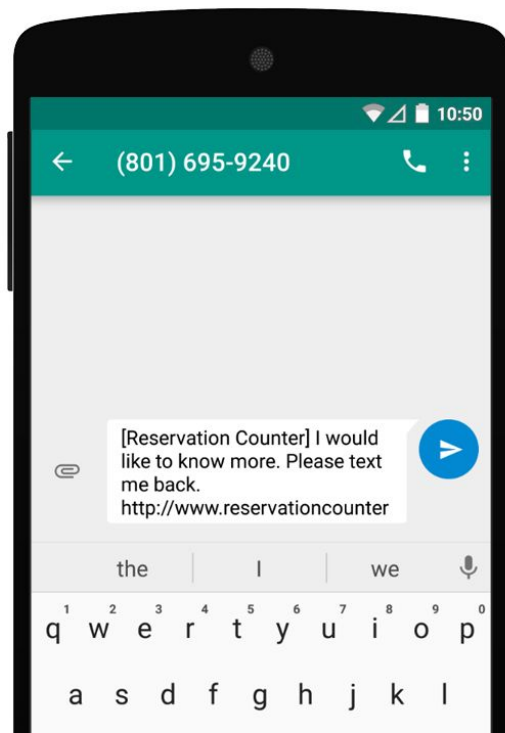
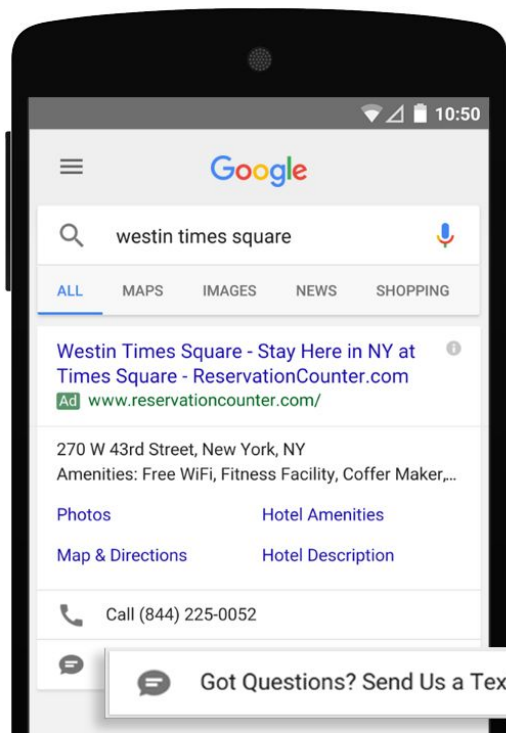


- Ads are core aspect of Google's business
- [Mature global business](#)
- Empowers users to interact with businesses via phone calls, including calls to toll free numbers (TFN)
- Google also uses TFN directly in "shared use" cases
- Bolsters revenue for both small and large businesses

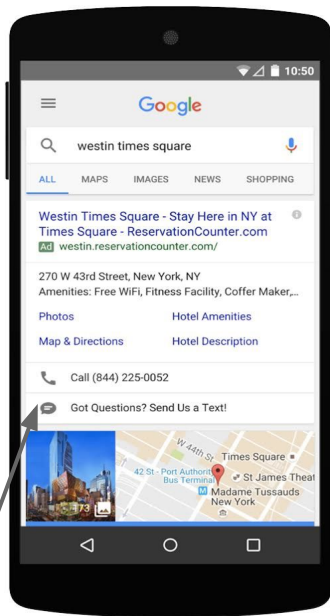
A screenshot of the "New phone number" setup form in Google Ads. The form includes fields for "Phone number" (with a dropdown for "United States") and "Show my ad with" (with options for "A Google forwarding phone number" and "My own phone number"). It also has a section for "Show the following links" (with options for "Both my website and the phone number" and "Just the phone number") and a "Report phone call conversions" section (with a checkbox for "Count calls as phone call conversions" and a dropdown for "seconds"). At the bottom, there is a "Device preference" section (with a checkbox for "Mobile") and a "Stat/end dates, scheduling" section. The form has "Save" and "Cancel" buttons at the bottom.

# Click-to-Message Ads

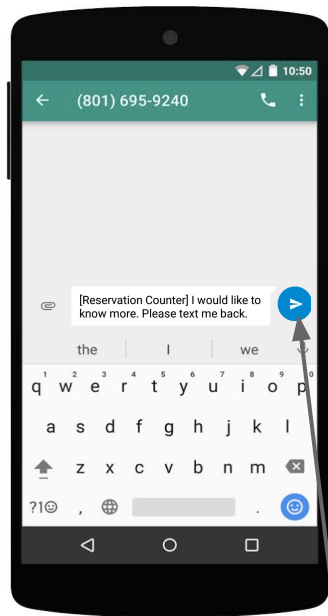
- Launched Globally in Q4 2016
- Empowers users to interact with businesses via text message, including texts to their toll free number (TTF)



# Example



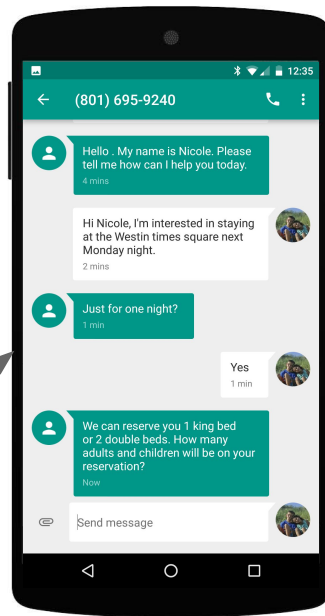
User taps Extension, which launches the SMS application with a pre-loaded message.



User sends the message.

A sent message is received by the business.

A timely response to the user helps engagement.



# Problems with the current framework



# Google's interest in the Somos Petition

- Through Click-to-"X" Ads, we represent thousands of small and large businesses who need toll free numbers to remain a trustworthy, secure, and reliable means for users to communicate with them
- Erosion of this trust harms Google--but also users, businesses, and the ecosystem

## Somos identifies real problems

- There is a clear vulnerability for fraud and abuse; harming both businesses and mobile users
- If a TTF provider bypasses the RespOrg, there are no controls to ensure that a toll-free number is enabled only for its subscriber
- Absent controls against fraud, TTF can't be a trustworthy form of communication for businesses and their customers
- Erosion of TFN trust will impact all uses of toll free numbers, including voice service

# CTIA, AT&T, etc. identify real concerns

- Subscriber choice should be honored
- There should not be a default single administrator
- Current rules do not resolve the questions

# Recommendations

# Third-party registries provide a workable solution

- There is a clear benefit to third-party registry administration of TTF
- Key is maintaining the authoritative position of the RespOrg
  - RespOrgs are essential to authentication and maintaining trust in the TFN ecosystem, including TTF use
- There could be multiple registries
  - Somos need not be the only one
  - There should be a neutral option
- Registries should have transparent policies and procedures
- Similar to proven LNP processes for voice

# The Commission should open a proceeding to identify industry-backed solutions

- Examine authority under 47 USC §251(e)(1), 47 USC §154(i) & toll free numbering rules
- Develop greater understanding of the issues that exist today
- Ask whether toll free administration should be expanded